**Monsanto**

APR 19 1972

FROM (NAME & LOCATION) E. Greene - St. Louis

DATE April 18, 1972

SUBJECT File PCB Labeling

REFERENCE

TO : Mr. W. A. Stewart

cc H. S. Bergen
W. R. Corey
T. L. Gossage
J. N. Haggart-Brussels
H. W. Hayden
David C. Jones
S. O. Morrison
C. Paton
W. B. Papageorge
G. Robert Sido
J. F. Stapleton

A number of us have discussed the questions raised by Bob Sido in his memorandum to you of April 10. The following is the consensus:

1. As Bob suggests we shall drop the word "warning" and replace it with "notice". As he also points out, this is consistent with other labeling practices.

2. We still feel that we would prefer not to offer incineration facilities nor to suggest that customers contact our offices and agents in case of leakage or spillage. We recognize that in the ultimate circumstances we have to be prepared to take back material, but before we do so, we want to make sure that the customer has exhausted all local facilities. We would also want to make sure that the material was properly packed and shipped. A leaky drum on the way back from Sao Paulo can do much more damage to the ecology and subject us to greater risks than a customer's continued usage of the material. Further, we wish to minimize the responsibility we take for proper disposal. Our agents, and in some cases our own offices, are not always qualified to give sound advice, but if they do offer advice, it subjects us to possible subsequent claims.

I have already sent you a telex from A. E. Meadowcroft, outlining the regulations IMCO will soon put into effect for European movements of PCB-containing compounds. I would like to suggest that you and Messrs. Sido and Morrison consider putting similar regulations into effect for U.S. shipments. Would you make some recommendations to me and the recipients of this memo?

Edmund Greene

EG/rh

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IN-10 REV. 11-65

PCB-ARCH0752509